

REMARKS

I. Introduction

Claims 12 to 24 are pending in the present application. In view of the foregoing amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

II. Rejection of Claims 12 and 16 to 18 Under 35 U.S.C. § 102(b)

Claims 12 and 16 to 18 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 4,690,366 ("Loup"). It is respectfully submitted that Loup does not anticipate these claims for at least the following reasons.

Claim 12 relates to an electric motor system for an air conditioning fan of a motor vehicle, including: an electric motor; a motor housing for the electric motor, the motor housing including a receiving opening into which the electric motor at least partially extends; at least one electrical connection element for supplying power to the electric motor; and an attachment unit for the at least one electrical connection element, the at least one electrical connection element being attached to the electric motor.

Although Applicants may not agree with the merits of the rejection, to facilitate matters, claim 12 has been amended to recite, in relevant parts, that **the motor housing includes an electrical connection element opening**, that **a portion of the electrical connection element is situated in the electrical connection element opening**, that **the electrical connection element includes a plate-shaped collar that covers the electrical connection element opening**, and that **the electrical connection element is not in physical contact with the motor housing**. Support for these amendments may be found, for example, on page 7, lines 10 to 13 of the Specification, as well as in Figure 1.

Loup does not disclose, or even suggest, that an electrical connection element includes a plate-shaped collar that covers an electrical connection element opening, and that the electrical connection element is not in physical contact with a motor housing. Loup describes a system for retaining an electric motor (10) in a housing (24). The housing (24) includes an opening (40) into which a connector (42) is inserted. When the motor (10) is inserted into the housing (24) and the connector (42) is inserted into the opening (40), a projecting lug

(56) on the connector (42) engages with a notch (58) in a cage (12) of the motor (10), thereby holding the motor (10) in place in the housing (24). However, **the connector (42), which the Office Action considers to constitute an electrical connection element, does not include a plate-shaped collar that covers opening (40). In addition, as is evident from Figures 1 and 2 of Loup, the connector (42) is in physical contact with the housing (24).** Accordingly, it is respectfully submitted that Loup does not anticipate claim 12 for at least these reasons.

As for claims 16 to 18, which ultimately depend from claim 12 and therefore include all of the features of claim 12, it is respectfully submitted that Loup does not anticipate these dependent claims for at least the reasons set forth above.

Regarding claim 17, it is respectfully submitted that Loup does not anticipate this claim for the following additional reasons. Loup does not disclose, or even suggest, that a plug is configured to be latched to an electric motor for secure contacting. As indicated in column 3, lines 7 to 8 of Loup, male connector tabs (50), which the Office Action considers to constitute a plug, are merely fixed, not latched, to the cage (12) of motor (10). Accordingly, it is respectfully submitted that Loup does not anticipate claim 17 for these additional reasons.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

III. Rejection of Claims 13 to 15 and 23 Under 35 U.S.C. § 103(a)

Claims 13 to 15 and 23 were rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Loup and U.S. Patent Application Publication No. 2003/0155822 ("Nadeau et al."). It is respectfully submitted that the combination of Loup and Nadeau et al. does not render these claims unpatentable for at least the following reasons.

Claims 13 to 15 and 23 ultimately depend from claim 12 and therefore include all of the features of claim 12. As set forth in detail in Section II of this response, Loup does not disclose, or even suggest, at least the features of claim 12, that an electrical connection element includes a plate-shaped collar that covers an electrical connection element opening, and that the electrical connection element is not in physical contact with a motor housing. Nadeau et al. describes a motor assembly (10), including a DC motor (12) and motor housing (14), a supporting

structure (30) and a decoupling structure (32) that mounts the motor housing (14) to the supporting structure (30). In addition, the motor assembly (10) includes an electronics housing (26), which contains a pulse-width-modulated switch (28), and whose conduit containing wires leading to motor (12) appears to be mounted to motor housing (14). However, as is apparent from Figures 1 and 2 of Nadeau et al., the conduit leading from electronic housing (26) to motor housing (14), which the Office Action apparently considers to constitute an electrical connection element, does not include a plate-shaped collar that covers a gap between an end (49) of the motor (12) and the motor housing (14). In addition, although not completely clear from the figures or disclosure of Nadeau et al., it appears that the conduit leading from electronic housing (26) to motor housing (14) may be in physical contact with supporting structure (30). Therefore, Nadeau et al. does not cure the deficiencies to Loup with respect to at least the above-mentioned features of claim 12. Accordingly, it is respectfully submitted that the combination of Loup and Nadeau et al. does not render unpatentable claims 13 to 15 and 23, which depend from claim 12.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

IV. Rejection of Claims 19 to 22 Under 35 U.S.C. § 103(a)

Claims 19 to 22 were rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Loup and U.S. Patent No. 3,518,616 ("Lewis"). It is respectfully submitted that the combination of Loup and Lewis does not render these claims unpatentable for at least the following reasons.

Claims 19 to 22 ultimately depend from claim 12 and therefore include all of the features of claim 12. As set forth above, Loup does not disclose, or even suggest, all of the features of claim 12. In addition, claim 19 also depends from claim 17 and therefore includes all of the features of claim 17. As set forth above, Loup does not disclose, or even suggest, all of the features of claim 17.

Furthermore, Lewis describes a motor lead connector box for mounting on an electric motor casing, but neither discloses or suggests, nor is asserted to disclose or suggest, any of the features of claims 12 or 17 not disclosed or suggested by Loup. Accordingly, it is respectfully submitted that the combination of Loup and Lewis does not render unpatentable claim 19, which depends from claims 12 and 17, as well as claims 20 to 22, which depend from claim 12.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

V. Rejection of Claim 24 Under 35 U.S.C. § 103(a)

Claim 24 was rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Loup, Lewis and Nadeau et al. It is respectfully submitted that the combination of Loup, Lewis and Nadeau et al. does not render this claim unpatentable for at least the following reasons.

Claim 24 depends from, inter alia, claims 12 and 17 and therefore includes all of the features of claims 12 and 17. As set forth above, neither Loup, nor Lewis, nor Nadeau et al. discloses, or even suggests, all of the features of claim 12, and neither Loup, nor Lewis discloses, or even suggests, all of the features of claim 17. Furthermore Nadeau et al. does not disclose or suggest, nor is asserted to disclose or suggest, at least the feature of claim 17 not disclosed or suggested by Loup and Lewis. Accordingly, it is respectfully submitted that the combination of Loup, Lewis and Nadeau et al. does not render unpatentable claim 24, which depends from claims 12 and 17.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

VI. Conclusion

In light of the foregoing, Applicants respectfully submit that all pending claims are in condition for allowance. Prompt reconsideration and allowance of the present application are therefore earnestly solicited.

Respectfully submitted,

Dated: June 3, 2009

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